

Is Africa really following Europe? An integrated framework for comparative regionalism

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Abstract

Most visibly since 2002, with the establishment of the African Union (AU), there have been indications that Africa may be following in Europe's footsteps in the process of regional integration. But is it really so? This article argues that, while there is an increasing focus on comparative regionalism in scholarly debates, we have not yet developed frameworks for empirical comparative research in this field. This often leads analysts to draw general conclusions from cases of institutional isomorphism, thus neglecting other critical dimensions. By applying an integrated framework, which takes into account the multi-dimensional aspects of old and new regionalisms, this article shows that the most critical features of the European regionalization process, from the gradual stepwise approach towards shared sovereignty to the focus on trade integration and social cohesion, are largely absent from Africa's regionalism, which presents very unique characters that are often overshadowed by traditional analyses.

Key words: regionalism; Europe; Africa; comparative analysis; regional integration and cooperation.

1. Introduction

At the European Union Studies Association annual convention in March 2015, the former High Representative Catherine Ashton singled out the emergence of new forms of regionalism as an indicator of success for the European Union's (EU) external action. Such remarks built on a common view among leading European politicians that the EU's best way to exert global leadership is by becoming a 'model' power' (Penketh, 2007).

Influencing regionalism may indeed be seen as a practical manifestation of the EU's capacity to propagate norms and shape institutional developments. There is little doubt that the proactive role played by EU institutions to support regionalism in other continents has led to a 'diffusion' of norms and institutional models (Börzel and Risse, 2009), sometimes influencing other regions via formal agreements (Bilal 2005; Clayes and Sindzingre, 2003), while sometimes being a source of inspiration (Jetschke and Lenz, 2012).

Most of this debate has however occurred without a meaningful framework for comparison (Acharya, 2012). In the early days of regionalism studies in the 1950s, the lack of comparative frameworks was not necessarily seen as a problem as most theories of regionalism focused on Europe. Notable efforts to produce comparative analysis with Latin America (Haas, 1961) or Africa (Nye, 1965) were largely aimed at testing concepts derived from the European case.

Since the mid-1990s, when new waves of regionalism reached most continents, the need for comparison became more cogent, especially to understand governance formations that defied original (Eurocentric) categorizations (Hurrell, 1995). Against this backdrop, some

have argued that we need an “institutionalized academic activity aimed at performing scientifically sound comparisons of regional integration processes across the globe and across time” (Langenhove, 2013, p. 19). The rationale for comparison can be interpreted as an opportunity to bridge gaps in conceptions, theories and case studies (Lombaerde *et al.*, 2010). At the same time, some point out that the EU’s dominance in comparative studies has produced an “integration snobbery”, as forms of regionalism that do not subscribe to the European ‘model’ are easily discarded as immature or under-developed (Murray, 2010, p. 308).

African regionalism efforts in the sub-continental communities and especially the African Union (AU), that is, the grand Pan-African project aiming to unite the entire continent, have adopted some of the institutional features found in European integration processes, from the establishment of commissions, councils and parliaments to similar symbols. In addition, Europe and Africa are more entangled than any other continents in the world, suggesting the potential for transfer and convergence. Their close partnership was sealed in 2007 through a sisterly agreement between the EU and the AU, an unprecedented strategic partnership linking two regional organizations. But do this closeness and some degree of institutional isomorphism (Meyer et al., 1997) really indicate a similar approach to regionalism?

This article contributes to the current debate on comparative regionalism by proposing an integrated framework for comparison, which – for the first time – takes into account the

multidimensionality of contemporary regionalisms and identifies key dimensions derived from both traditional regional integration theory and new regionalism approaches, thus reconciling schools of thought that have often developed in silos.

In the next sections, we deal first with the concept of regionalism and how it is defined in ‘old’ and ‘new’ approaches. Then we delve into the current state of comparative regionalism, highlighting the lack of systematic methods for empirical analysis. After having defined our integrated framework, we compare how the key dimensions play out in Europe’s and Africa’s regionalisms, with a particular focus on the EU and the AU. We conclude by reflecting on how our approach can strengthen the academic rigour of comparative regionalism studies, which we see as a precondition for this new field to mature as a leading scholarly effort in political studies.

2. Regionalism: a synthesis between ‘old’ and ‘new’ approaches

As states and non-state actors intensify and sophisticate transboundary governance, the very study of regionalism has grown in complexity and conceptual nuances. But, what is a region?

Nye provided one of the most traditional definitions: “a limited number of states linked together by a geographical relationship and by a degree of mutual interdependence” (Nye, 1965, p. vii). From a reflectivist perspective, by contrast, regions can be seen as ‘constructs’, which are defined by discursive interactions at the political, economic and social level (Katzenstein, 2005; Langenhove, 2012). As such, regions are not physically

predefined, but are subject to change over time, in line with the prevailing discourses taking place in each society (Acharya, 2009). The definition gamut of regionalism (geographically given vs. social constructed, state-driven or otherwise, etc.) represents one of several elements in the conceptual distinction between regional integration theorists (Haas and Schmitter, 1964; Mattli, 1999) and advocates of 'new' regionalism (Hettne, 2005).

Early scholars of regionalism focused primarily on institutional processes and the behaviour of states and their political elites. They conceived regionalism as regional integration, in the sense of 'pooling' national sovereignty to achieve greater institutional development or in response to existential threats to nation states (McKay, 2001). Ernst Haas, the founder of the neo-functionalist approach, defined regional integration as the process of transferring decision-making power to a new regional centre (Haas, 1961). Karl Deutsch viewed integration as the attainment of a "sense of community," which is made possible by factors such as compatible values and expectations of economic benefits among elites (Deutsch et al., 1957, p. 5). Some comparative tools were used, albeit sporadically, to identify which factors were more or less important in explaining successful and durable regional integration. In the 1960s, Haas and Schmitter proposed a comparative framework to gauge the extent to which economic union would lead to political union. By measuring various structural variables (e.g. size, decision-making style, rate of transaction, etc.), the authors felt they could predict the likelihood of an "automatic politization" of the integration process (Haas and Schmitter, 1964, p. 720). It was an eminently institutionalist framework, focusing on political elites and state-centred processes and understanding regionalism in terms of specific top-down institutional arrangements.

Early political economists, too, modelled their theories along a top-down, institutions-focused, linear path of integration. Jacob Viner (1950) and, particularly, Bela Balassa (1961) discussed the gradual intensification of economic cooperation following an inherent linearity, ranging from free trade to economic and monetary union. In this view, integration follows a pre-determined step-wise model and comparative analysis is aimed at gauging how far different regions have come on this continuum. In a similar vein, those interested in the economic analysis of integration devised comparative models to track the extent to which demand factors (e.g., economic incentives, relative payoffs, market gains, etc.) are matched by supply factors (e.g., regional leadership) (Mattli, 1999; Mattli, 2012). Scholars adopting a perspective from peripheral regions occasionally engaged in comparisons (Axline, 1994), by mostly outlining the institutional change accompanying particular organizations.

The emergence of a new generation of regionalisms in the post-Cold War order has brought a significant degree of complexity into this picture, while calling for new ways to compare regions. In particular, the new regionalism approach (Hettne, 2005) has repudiated the uniqueness of the European experience, while highlighting the Eurocentric nature of most traditional theories of integration. For some, comparative regionalism should be built in the shadow of the existing fields of area studies and EU studies (Breslin *et al.*, 2002). This has had a contradictory effect on comparative analysis: on the one hand, more comparison is needed to show the kaleidoscope of regionalisms across the globe; on the other, most analyses have been ad hoc, given that the varieties of regionalisms do not easily lend

themselves to structured examination (Telò, 2001; Laursen 2003). Although new regionalism scholars have encouraged comparative analyses that take into account private actors and informal regionalization (Hettne *et al.*, 2001), the focus on political institutions has remained prevalent. This can also be seen among those constructivists repudiating much of the top-down approach of regional integration theorists (Acharya and Johnston, 2007). Lately, there have been more efforts to conceptualize regionalism taking into account the limitations of the Westphalian model and broadening the scope of analysis to different actors (Langenhove, 2011; Engel *et al.*, 2014).

A number of authors have also been trying to address the critique of Eurocentrism by moving away from EU-coined concepts and rationales of regional integration (Solingen, 2014). EU-centred notions of supranationality, which imply a formal transfer of sovereignty by state actors, are of limited value in a comparison with Asian, Latin American or African regionalisms. Against this backdrop, Rosamond (2009, p. 119) argues that “the EU is at best a deviant case of regionalism.” In many regards, Europe can indeed be seen as a relative latecomer to regionalism. There had been formal integrative Pan-American Conferences in the 19th century, while European states were still fighting one nationalist war after the other. West and Central Africa had a common currency before European countries agreed on the ECU (the predecessor of the Euro). The Southern African Customs Union (SACU) was formally binding labour and public budgets in Southern Africa at a time when Schengen was still a fameless village. This is not to deny that there might be a ‘global script’ (Börzel and van Hüllen, 2015) explaining the proliferation of regional projects and that the EU might play an important role in it. But if there is diffusion

it seems more concerned with the formal institutional setup of the EU and its symbols rather than with its integration rationale.

While there have been repeated calls for a synthesis of the distinct theoretical elements in the field (Söderbaum, 2009; Lombaerde *et al.*, 2010), little has been achieved on this front. By and large, most edited books are a collection of case studies, where the truly comparative element lies in the editor's concluding chapter or even in the reader's own synthetic skills. As Söderbaum asserts, "the use of comparison is underdeveloped in the field of regionalism, primarily because many scholars specialize in a particular region" (Söderbaum, 2012, p. 21). One of the most recent overviews in the field (Mattli 2012) mentions only institutional state-driven approaches to comparative regionalism: it starts with neofunctionalism, then moves onto his own supply and demand framework, and finally concludes with an analysis of research focusing on institutional design and power asymmetries (Cooley and Spruyt, 2009), all of which follow the tenets of traditional theories of regional integration. No discussion is offered of alternative schools of thought on regionalism, especially those inspired by constructivism (Katzenstein, 2005), let alone new approaches to regionalism, thus confirming the fact that the comparative regionalism literature has struggled to produce concepts and methods able to combine old and new theories of regionalism.

What can the vast array of regionalism theories and concepts offer to empirical comparative analysis? Can approaches from different schools be integrated to move the research agenda forward? Condensing the most relevant contributions has already shown the advantage of

identifying crucial factors from an economic, social, and political point of view (see Mattheis 2015). As one scholar has suggested, we indeed need to ‘unpack’ regionalism into its key dimensions in order to effectively compare regional governance trends across the world (Langenhove, 2012). In the next sections, we therefore elaborate on the dimensions of our comparative framework, which builds on key inputs provided by both regional integration theories and new regionalism approaches.

3. Comparing regionalisms in Europe and Africa: an integrated framework

There is a core group of key themes that are highlighted by old and new approaches to regionalism (Table 1). These include the process of integration (which is seen as linear by traditional theories and fuzzy by new approaches), institutional structures (formal and informal), leadership (state-centric and diffused), membership (inclusive and exclusive), economic and social drivers (trade, market integration, and cultural/social cohesion), the pooling of sovereignty as opposed to the degrees of cooperation, as well as the territorial/socially constructed identity of a region. If we unpack these themes into a list of observable dimensions, we can define the following set: process of regionalization, institutional design, type of regional leadership, conditions for membership, approach to sovereignty, drivers (whether in the economic, political or social fields) and type of regional identity. These are the dimensions that we suggest should guide a more coherent comparative analysis of regionalism capable of capturing the key lessons produced by decades of research on regional integration while combining them with the nuances and diversity introduced by new approaches.

Table 1 about here

We apply the framework to Europe and Africa because this comparison could be the litmus test in advancing empirical analysis in comparative regionalism. No other regions in the world are indeed equally connected. The inter-regional political dialogue, financial dependence and the strategic partnership between the two regions provide a strong basis for possible convergence and transfer along the key dimensions. Moreover, generic references to Africa following in Europe's footsteps are often made in policy circles, while researchers interested in comparing the EU and the AU have mostly focused on the supranational-intergovernmental institutional divide, which sets the two institutions apart in various areas (Zank, 2007). We need to build on this research with new tools and conceptualizations, with a view to avoiding superficial generalizations about similarities across regions, which risk endangering the capacity of comparative regionalism to affirm itself as a field of empirical research.

3.1 Process

The process of regional institutionalization in Europe gained remarkable speed in the 1950s with the pooling of sovereignty in the management of strategic natural resources, namely coal and steel, which had been traditional causes of conflicts throughout the continent. Although Churchill had been calling for a 'United States of Europe' and federalists had been working for the establishment of a federal union, the actual integration followed a gradualist approach and began by tackling areas of 'low politics,' progressing through bargains and economic incentives (Moravcsik, 1998; Mattli, 1999). Such pragmatism

allowed for the incremental evolution of the European Coal and Steel Community (ECSC) to the European Economic Communities and eventually to the EU. This process was left ‘open-ended’ by the contracting states, thus allowing for flexible adaptation to changing needs and generating possibilities for further, largely unplanned, integration (Cooley and Spruyt, 2009). By and large, such functional gradualism has allowed member states to achieve greater levels of cooperation and pulled in members from the competing European Free Trade Agreement (EFTA), while producing supranational integration in some key sectors, from trade to monetary policy.

Region-building in Africa has followed an opposite process. After de-colonization, the continent split along two contrasting visions, which ranged from Pan-African federalism in the case of the so-called Casablanca group to a cooperation approach based on strong nation-states in the case of the competing Monrovia group (Farmer, 2012). The Organization of African Unity (OAU) emerged in 1963 as an uneasy compromise between the two stances. It was an eminently intergovernmental institution, with no plan to integrate or pool sovereignty in any field, and it upheld the principle of non-interference in domestic affairs. The OAU privileged breadth of geographical reach at the expense of depth of implementation. The sub-continental organizations that emerged since the 1980s, conventionally known as regional economic communities (RECs), were in part an attempt to achieve better cooperation in the sub-regions in the face of a rather ceremonial continental organization. Since the outset, the RECs committed to achieve full integration, but without providing clear incentives and step-wise procedures needed to restructure national economies, as had been the case in Europe. Even the West African Economic and

Monetary Union (WAEMU), which is the continent's most successful monetary integration initiative, did not expand gradually, like monetary integration in the Eurozone. It simply replaced pre-existing institutional arrangements between France and its former colonies in the 1990s (Clayes and Sindzingre, 2003).

After its inception in 2002, the continental project of the African Union (AU) was again caught in an internal debate regarding how to proceed with the integration process. Until 2011 headed by Libya's former leader Gaddafi, a group of some 20 states has been supporting the plan of a strong political union. Yet, over the years, the economic integration plans for the continent have been systematically revised and postponed, currently envisioning an African Economic Community only by 2028, but without a functional basis for stepwise integration. Similarly, although a number of key natural resources cut across national borders and could easily trigger tensions among African countries, dedicated regional governance mechanisms are scant and have no resemblance to those leading to the creation of the ECSC in Europe.

3.2 Institutional design

European integration has evolved into a complex system of institutions, some with a political profile while others have a technical vocation. Yet, this evolution has not been linear or particularly coherent. The functional evolution described in the previous section has led to a cohabitation between supranational and intergovernmental components, which some observers have described as an institutional mix – the so-called community method – characterized by the development of flexible mechanisms of implementation, often

popularized through terms such as variable geometry, Europe à la carte, two-speed Europe or the “new” intergovernmentalism (Bickerton et al. 2014). The result has been the establishment of hybrid institutions. The European Council is mainly intergovernmental, although the Lisbon Treaty has introduced some supranational elements, such as the Presidency. The European Commission constitutes an executive characterized by supranational and intergovernmental elements, as members are nominated by national governments but are expected to act in the interest of the entire union. Both institutions are monitored by the European Parliament, whose composition is determined via country-level elections but cuts across national constituencies. The two eminently supranational institutions are the European Central Bank and the Court of Justice. These pivotal bodies are complemented by a vast array of supranational technical organizations representing interest groups and civil society as well as sub-national regions and local authorities.

Some have argued that Africa’s regionalisms have a predilection for mimicking the EU’s institutional architecture (Draper, 2012). In a sense, this may be seen in the shift from the OAU to the AU, starting with the new name of the organization to emphasize the idea of “Union” (similar to the shift from the European Community to the EU in the 1990s). In its institutional architecture, the AU resembles the EU: it is indeed governed by a Commission appointed by member states, which has a supranational vocation, at least rhetorically. It has its own Pan-African Parliament and is led by the Assembly of the AU, which is where the heads of state and government are represented. Its Executive Council, similar to the EU Council of Ministers, is made up of ministers designated by national governments. Yet, neither the AU nor any other African region has a truly autonomous supranational

institution. The African Court on Human and People's Rights, which may resemble the EU court, only has jurisdiction over disputes relating to the AU Charter, with a very limited mandate. Even WAEMU, which has a regional central bank overseeing the monetary union, is dependent on the 'special' relationship with France as the ultimate guarantor. The African Development Bank has considerable informal means due to its role as donor for regional infrastructure, but has no central banking authority.

3.3 Leadership

Despite voting and veto rights also benefiting smaller states, the largest and most longstanding members of the EU often dominate the agenda. In particular, Germany and France have traditionally been at the centre of the integration process, providing the visionary leadership that – with ups and downs – has continued steering the integration process over the various decades (Cooley and Spruyt, 2009). They have also been willing, to varying degrees, to provide the necessary public goods and side payments enabling the EU to continue expanding. The Franco-German alliance remains a rather peculiar element of the European integration, because it provided a balance of forces and a form of reciprocal containment, thus reducing the risk of a strong hegemon dominating over smaller states (Cooley and Spruyt, 2009). This equilibrium also offered possibility for leadership (at least in some areas) to other countries, such as the UK and Italy, or even smaller formations, such as the Benelux (Loriaux, 1999; Hurrell, 1995). Although states are dominant actors in European integration, the complex institutional setup allows for the participation of numerous non-state actors in a system of multi-level and multi-sector governance, with a significant role played by business associations and non-governmental

organizations (Hooghe and Marks, 2001). EU institutions themselves, thanks to their supranational mandate, have become leaders of integration in their own right (Laursen, 2003).

In Africa, leadership has been more ambiguous. Most forefathers of African unity hailed from countries that did not have the economic capacity and infrastructure to provide public goods for the unification project. Both South Africa and Nigeria, the continent's largest economies, have refrained from playing the role of 'cooperative hegemon' traditionally associated with Germany or France (Pedersen, 2002). South Africa was also a latecomer to Pan-African regionalism, as the apartheid government followed its own region-building ambitions (mostly through annexation) in opposition to the rest of the continent. Although both countries have been crucial actors in the creation of the AU, they have mainly conceived it as an arena to play out their national foreign policy interests, such as the 'African renaissance' discourse initiated by former South African president Thabo Mbeki (Tieku, 2004). While Nigeria has been more successful at leading its regional community, ECOWAS, the Southern African Development Community, which is the pivotal regional economic community in Southern Africa, has not benefited from South Africa's leadership, remaining one of the weakest and least resourced communities in the continent.

Conversely, it is often external or non-state actors that provide de-facto leadership in Africa's regionalism. As we have discussed, the continent's most successful monetary integration initiative, WAEMU, was made possible by France acting as a guarantor. The EU itself is a major sponsor and funder of regional schemes. Also, both South African and

Nigerian companies enjoy massive outreach in the rest of the continent, contributing to the integration of governance systems and economic flows. Especially in the retail, financial and communication industries, they have indirectly created a form of ‘private’ regionalism (Iheduru, 2012).

3.4 Membership

Membership to the EU is selective and, to a certain extent, exclusive. The main criteria for membership are compliance with a set of general governance parameters and the *acquis communautaire*, which has to be incorporated into national law (Böröcz, 2009). Legal convergence is rewarded through clear economic incentives and side payments. Violations of norms are threatened by a vast array of sanctions. This has generated a relative uniformity in terms of political and economic policies, which is not the case throughout Africa, where different political and economic ideologies co-exist (Zank 2007).

Geographical continuity also plays a role, as indicated by the Eastern enlargement process and the divisive character attributed to the Mediterranean, but is not indispensable as witnessed by the various territories overseas. Membership comes in various degrees of thickness, depending on the number of treaties joined, from the Schengen agreement to the Eurozone, and on the conditionality agreed with applicant countries. At the same time, with the now negligible exclusion of the European Free Trade Area, the EU is the only game in town when it comes to regional integration in Europe. EU nations can be members of other regional organizations, such as NATO or the Council of Europe, but only if these organizations are functionally confined.

By contrast, African regionalism, whether at the continental or sub-continental levels, has adopted a ‘universal membership’ approach, thus reducing the political and economic incentives as well as the responsibilities that come with membership. Member states both at the AU level and at the RECs can be suspended, but only when there are unconstitutional changes of governments (that is, when there is a subversion of the status quo). All African nations are entitled to join the AU and indeed have, with the exception of Morocco, which refuses to join due to disputes of territorial sovereignty. The porous confines of the RECs have also added a further layer of complexity. Various countries are members of different RECs and several member states regularly shift from one group to another depending on the issue at hand. While overlapping membership is not a problem per se, it is the competing mandates that create inconsistencies, especially in the field of economic cooperation.

3.5 Sovereignty

Regionalism has changed the practice and perception of sovereignty in Europe. Even though nation states retain key positions of power, integration has shifted sovereignty to both sub-national and supra-national levels. This process has been characterized by two elements: pooling and subsidiarity (Hooghe and Marks, 2014). Pooling began with the shared administration of coal and steel after the Second World War and has culminated in the financial domain with the European Central Bank, in the legal systems via the Court of Justice and in the management of the single market through the Commission. Subsidiarity has worked towards strengthening administrations at the subnational level and within cross-border micro-regions, conventionally known as ‘Euregions’. EU law can overrule member

states' decisions and the European Parliament has gradually increased its influence. Nevertheless, national governments retain a considerable amount of sovereignty over issues such as security, either directly or through the regional intergovernmental decision-making bodies.

In Africa, where national sovereignty was a much-awaited achievement of the end of colonization, the impact of regionalism has been rather different. Although the Casablanca group advocated for a continental federation, the resulting compromise was the OAU, a strictly intergovernmental organization underpinning national sovereignty and non-interference as key values. It was driven by heads of state and government and their domestic considerations, giving birth to what some have called 'sovereignty boosting' regionalism (Soderbaum, 2004, p. 419). Coupled with the lack of any obligations on the part of its members, the OAU did not have the capacity to produce binding commitments (Walraven, 1999). To a certain degree, the transition to the AU has implied some new thinking regarding the concepts of national sovereignty and non-interference, especially in so far as crimes against humanity and unconstitutional change of power are concerned (Zank, 2007). Besides the requirement to respect constitutional prerogatives in the transfer of power, with the introduction of the African Peer Review Mechanism (APRM), a regional voluntary framework to assess the quality of governance in the continent, African states have also become subject to regional external scrutiny. Most RECs have formally questioned national sovereignty and non-interference, but the practice has been ambivalent. Only in West Africa, ECOWAS has repeatedly defended the principle whereby power can only be acquired and maintained via constitutional means. Moreover, while the

supranational character of European regionalism requires member states to incorporate regional regulations in their national laws, the process of norms transfer has been much less straightforward in Africa's regions, where poor ratification is a critical drag on regional cooperation (Nshimbi and Fioramonti, 2014).

3.6 Drivers

Although Balassa had postulated that regional integration is dominated by economics and proceeds step-wise towards an economic union, neither Europe nor Africa followed such a process in practice. Europe evolved from sharing sovereignty on coal, steel and nuclear energy to building a free trade area and ultimately a single market, with a common currency. Moreover, while trade integration was undoubtedly the driving element behind the process of integration, quite important were also the social elements of the European integration process. Jacques Delors was among the first to popularize the term 'European Social Model' (ESM) in the mid-1980s by indicating a European way to market integration. The basic idea behind the ESM is that "economic and social progress must go hand in hand", that "economic growth [...] is to be combined with social cohesion" (Jepsen, 2005, p. 234). The co-existence of two drivers of regional development, that is, trade and social cohesion, has given both strong and weak economies incentives to integrate their markets. Nevertheless, as the Euro-crisis has emphasized, tensions have always existed between the goals of market liberalization and those of equitable social development (Vaughan-Whitehead, 2003; Beugelsdijk and Eijffinger, 2005).

Customs unions are surprisingly common at the sub-continental level in Africa (Kenen and Meade, 2008). Some of these, such as SACU, predate the process of integration in Europe. WAEMU built monetary integration in the mid-1990s, before the Euro became a reality. Yet, trade integration at the continental level and within the various RECs, let alone its social dimension, is still very limited, although there is no shortage of plans for free trade areas, including an ambitious free trade area involving three sub-continental regional organizations and covering half of the continent. African economies focus on trade with other regions of the world rather than intra-African trade, which stands in stark contrast to the EU, where levels of intra-block trade have always surpassed those with the outside world by various orders of magnitude (UNCTAD, 2013). Some African observers, including former UN under-secretary general Adebayo Adedeji, have long questioned whether trade can be considered a useful lens to understand Africa's regionalism and have put forward alternative proposals focused on infrastructure development (Asante, 1991). At the same time, this does not mean that regional movement (of goods, services and people) is impaired in practice. As we have mentioned, many companies operate across borders. Informal cross-border traders are a significant economic activity (UNECA, 2013) and both ECOWAS and the East African Community have eliminated visa requirements by introducing regional passports.

High politics has dominated much of Africa's regional rationale. The AU itself, through its Peace and Security Council, has developed an Africa Peace and Security Architecture. In many regards, security management and conflict prevention/resolutions are key drivers of Africa's regionalism. By contrast, the extent to which the security component can be

considered a driver of Europe's integration is unclear, as the EU has been rather sceptical of equipping itself with a fully-fledged military or police force. At the same time, there is no doubt that the process of regional integration in Europe was initiated as a conflict-prevention mechanism, as exemplified by the establishment of the ECSC. Moreover, the intimate link between the EU's member states and the NATO has provided much of the security framework to Western Europe during the Cold War and continues to provide a leading role nowadays.

3.7 Identity

The desire to integrate African societies on a regional basis has been strong for several decades. Early thinking on regionalism in the African continent was grounded on Pan-Africanism, an ambivalent ideology with diverse currents united by the desire for the emancipation and unity in Africa, be it in a territorial, racial or anti-colonial understanding (Geiss, 1974). These ideas also strongly influenced post-colonial African liberators, including the first president of Ghana, Kwame Nkrumah, who was among the early champions of the idea of the United States of Africa (Zank, 2012). Pan-Africanism is very much present in contemporary discourse, too. Possibly no other region in the world shows such a deep-rooted continental identity as Africa. Common languages, cross-border ethnic connections and regional migration make the continent's national delineations extremely porous.

Pan-Africanism also defines the African region as geographically consistent. Although the Pan-Africanist vision originated in the Caribbean among locals of African descent, it

has assumed a specific character in the African continent. Even in the Maghreb - Morocco aside - and in Egypt, the AU constitutes the paramount reference point of formal region-building. By contrast, Europe's geography is in flux and so is its identity (Cerutti and Lucarelli, 2008), despite the efforts of EU institutions to promote cultural convergence through free movement, educational policies, and symbolisms. While being 'African' is a common public appeal for Africa's heads of state and government, such a term resonates less in the European public sphere. Possibly, however, Pan-Africanism provides a rhetorical cloak to hide divisions and lack of a common approach to governance in Africa. In the end, it is self-evident that the idea of Pan-Africanism, while providing a cultural glue throughout the continent, has contributed minimally to triggering cooperation in fields that make a difference for common Africans, from economic entanglement to social cohesion.

4. Europe and Africa: a brief synthesis

In Table 2, we have summarized the key points raised in the preceding sections. Our integrated framework shows that, when looking more closely, both Europe and Africa have adopted rather complex approaches to regionalism, which defy easy categorizations. Whether through their main continental organizations (the EU and the AU), or through various regional institutions, they are examples of mixed forms of regionalism, marked by nuances, fuzzy boundaries and non-linearity. Moreover, the various dimensions we have highlighted help to zoom in on critical aspects of regionalism, which may be easily overlooked in the absence of a structured analytical framework.

Europe and Africa are certainly different in so far as the process of integration and membership are concerned, with gradualism and selectivity opposed to grand plans and universality (although federalist agendas have been significant in European integration too). Drivers have also been different in the two continents, with low politics dominating in Europe and high politics leading in Africa. This is not to say that economic integration has been absent in Africa. Indeed, while trade integration is still limited throughout the continent (but potentially expanding in the near future), monetary integration and movement of people are quite advanced in some regions.

Table 2 about here

Institutional designs present resemblances, at least in so far as both continents have developed a mix of supranational and intergovernmental elements, although Africa has an obvious predilection for intergovernmental institutions. Non-interference, which used to be a corner stone of Africa's regionalism until the turn of the millennium, has however been increasingly eroded by evolutions both at the continental and regional level. Currently, there are material and perceived gains for a country wishing to join a REC or the monitoring action of the AU through the APRM, as membership facilitates access to foreign aid and investment, while expulsion or suspension entails negative consequences in terms of prestige and legitimacy.

Leadership and identity also exhibit remarkable differences. No African country has ever been in the position or willing to provide regional public goods at the scale that Germany

and France have done in Europe. Leading economies such as South Africa and Nigeria have been at best ‘reluctant hegemons’ or ‘hegemons on a shoe-string’, supporting institutional development and security interventions in the rest of the continent with limited budgets and short-term commitments (Alden and Le Pere, 2009).

By contrast, Africans have traditionally upheld a continental notion of Africanism and African-ness, while Europeans have struggled to embrace a shared identity. In Europe, the focus has been on formal institution building and on the standardization of the legal and administrative procedures of member states (a process generically referred to as ‘Europeanization’). In Africa, political and cultural discourse has traditionally been driven by a strong sense of continental identity, but without a concerted effort to achieve functional institutional integration.

4. Conclusion: beyond formal institutions

If we go beyond symbolic institutional resemblances and compare various dimensions characterizing the multi-layered process of regionalism (as exemplified in our framework’s dimensions), it becomes clear that Europe and Africa embody two complex examples of regional governance, largely shaped by distinct logics. The only similarities are generic in nature. They amount to a ‘bumper sticker,’ a sort of visible certification or quality control, which has allowed the AU and its RECs to become privileged partners of the EU, a relationship further reinforced by the only joint strategy Europe has ever sealed with another region in the world. Both regions have adopted the word ‘union’. Both are led by a Commission, some type of Council/s and a regional Parliament. They even have a similar

flag, with the maps of the respective continents surrounded by a circle of stars. Europe and Africa, through their ‘twin’ organisations have been made closer, but only apparently so. When one looks at the actual drivers, approaches, principles and modalities of regionalization, it becomes clear that neither Europe nor Africa followed clearly defined linear paths to integration, and that differences are certainly more significant than superficial similarities.

We live in an era in which regionalism has become an important form of governance throughout the world. This trend has been actively encouraged by the EU itself, arguably as a strategy to enhance its relevance in global affairs (Mattheis, 2010). In turn, this has made it fashionable to speak about ‘models’ of regional integration. Although EU officials publicly emphasize that each process of region building should be developed endogenously, there is possibly an element of narcissism in inspiring countries to forge regional governance systems informed by the European example. This is reinforced by pre-conceptions and limited comparative tools in academic and policy circles as well as by a lack of equal knowledge about other approaches to regionalism.

An integrated framework like the one we propose here helps to move the research agenda forward, by combining the key lessons we have learned from decades of studies on regional integration with more recent reflections on the nuances of new regionalisms. This article has contributed to the current debate by providing a set of key dimensions, which we believe can greatly assist researchers in capturing regionalism in its multifaceted nature. As the framework is expanded and more research is conducted on each dimension, we will also

be able to test hypotheses as to what are the key triggers of different forms of regionalism. Moreover, comparative analysis will be better equipped to explain enduring and successful regional governance arrangements amid the varieties of regionalism we see emerging throughout the world. Without variance there is indeed little scope for more inquisitive empirical research, which is the ultimate limitation of purely institutional (often Euro-centric) approaches to regional integration. By engaging in coherent comparative analysis we may be able to overcome the limitations of current theories, which are largely based on purely abstract understandings of regionalism rather than their complex empirical reality.

Regionalism itself is continuously evolving and it may very well be that non-European regions may soon become the champions of alternative forms of regional cooperation and integration. The recent Euro-crisis and the rise of anti-European movements on both ends of the political spectrum have called into question some aspects of the European integration process and its alleged combination of market and social values (Fioramonti, 2012). These shifts also affect the perception of the European integration process and its applicability to other regions of the world. There is evidence, indeed, that more and more countries in the Global South are increasingly wary of the sustainability of the European 'path' to regionalism (Fioramonti, 2012). There may be fear that the EU has tried to accomplish too much too soon, and that perhaps other types of regionalism may be better suited to deal with the governance challenges posed by economic, social and environmental crises. As scholars become aware of the traditional overreliance on institutional isomorphism and symbolic emulation, non-European regions may very well become sources of inspiration for the study of regionalism in the 21st century.

References

- Acharya, A. (2009) *Whose Ideas Matter? Agency and Power in Asian Regionalism* (Ithaca, NY: Cornell University Press).
- Acharya, A. (2012) 'Comparative Regionalism: A Field Whose Time Has Come?'. In Fioramonti, L. (ed.) *Regionalism in a Changing World: Comparative Perspectives in the New Global Order* (London: Routledge).
- Acharya, A. and Johnston, A. (eds) (2007) *Crafting Cooperation: Regional International Institutions in Comparative Perspective* (Cambridge, Mass.: Cambridge University Press).
- Alden, C. and Le Pere, G. (2004) 'South Africa's Post-apartheid Foreign Policy: From Reconciliation to Ambiguity?' *Review of African Political Economy*, Vol. 31, No. 100, pp. 283-297.
- Asante, S. K. B. (1991) *African Development: Adebayo Adedeji's Alternative Strategies* (London: Hans Zell Publishers).
- Axline, W.A. (ed.) (1994) *The Political Economy of Regional Cooperation: Comparative Case Studies* (London: Pinter).
- Balassa, B. (1961) *The Theory of Economic Integration* (Homewood, Illinois: R.D. Irwin).
- Beugelsdijk, M. and Eijffinger, S.C. (2005) 'The Effectiveness of Structural Policy in the European Union: An Empirical Analysis for the EU-15 in 1995-2001'. *Journal of Common Market Studies*, Vol. 43, No. 1, pp. 37-51.

- Bickerton, C., Hodson, D. and Puetter, U. (2014) 'The New Intergovernmentalism: European Integration in the Post-Maastricht era'. *Journal of Common Market Studies*, doi: 10.1111/jcms.12212
- Bilal, S. (2005) 'Can the EU Be a Model of Regional Integration? Risks and Challenges for Developing Countries', paper presented at CODESRIA - Globalisation Studies Network (GSN), Senegal, August 2005.
- Börzel, T. and Risse, T. (2009) 'The Transformative Power of Europe: The European Union and the Diffusion of Ideas'. Working Paper Series of the Research College "The Transformative Power of Europe", No. 1.
- Börzel, T., van Hüllen, V. (2015) (eds) *Governance Transfer by Regional Organizations: Patching Together a Global Script* (London: Palgrave).
- Breslin, S., Higgott, R. and Rosamond, B. (2002) 'Regions in comparative perspective'. In Breslin, S., Hughes, C.W., Phillips, N. and Rosamond, B. (eds) *New Regionalisms in the Global Political Economy* (London: Routledge).
- Cerutti, F. and Lucarelli, S. (eds) (2008) *The Search for a European identity: Values, Policies and Legitimacy of the European Union* (London: Routledge).
- Claeys, A.S. and Sindzingre, A. (2003) 'Regional Integration as a Transfer of Rules: The Case of the Relationship Between the EU and WAEMU,' paper for the DSA Annual Conference, University of Strathclyde, September 2003.
- Cooley, A. and Spruyt, H. (2009) *Contracting States: Sovereign Transfers in International Relations* (Princeton: Princeton University Press).
- Deutsch, K.W. et al. (1957) *Political Community and the North Atlantic Area* (Princeton, NJ: Princeton University Press).

- Doidge, M. (2007) 'Joined at the Hip: Regionalism and Interregionalism'. *Journal of European Integration*, Vol. 29, No. 2, pp. 229–248.
- Draper, P. (2012) 'Breaking Free from Europe: Why African Needs Another Model of Integration'. In Fioramonti, L. (ed) *Regionalism in a Changing World: Comparative Perspectives in the New Global Order* (London: Routledge).
- Engel, U., Mattheis, F., Plötze, T. and Zinecker, H. (2014) 'Neue Regionalismen in Afrika und Lateinamerika – Globale Ordnungsprozesse im Wandel'. *Denkströme. Journal der Sächsischen Akademie der Wissenschaften*, No. 4, pp. 99–115.
- Farmer, L.J. (2012) 'Sovereignty and the African Union' *Journal of Pan African Studies*, Vol. 4, No. 10, pp. 93-105.
- Fioramonti, L. (ed) (2012) *Regions and Crises: New Challenges for Contemporary Regionalisms* (Basingstoke: Palgrave).
- Geiss, I. (1974) *The Pan-African Movement* (London: Methuen).
- Haas, E.B. (1961) 'International Integration: The European and the Universal Process'. *International Organization*, Vol. 15, No. 3, pp. 366–392.
- Haas, E.B. and Schmitter, P.C. (1964) 'Economics and Differential Patterns of Political Integration: Projections About Unity in Latin America'. *International Organization*, Vol. 18, No. 04, pp. 705-737.
- Hettne, B. (2005) 'Beyond the 'New' Regionalism'. *New Political Economy*, Vol. 10, No. 4, pp. 543–571.
- Hettne, B., Inotai, A. and Sunkel, O. (eds) (2001) *Comparing Regionalisms: Implications for Global Development*. A UNU-WIDER study, Vol. 5 (Basingstoke: Palgrave).

- Hooghe, L. and Marks, G. (2001) *Multi-level Governance and European Integration* (Lanham, MD: Rowman & Littlefield Publishers).
- Hooghe, L. and Marks, G. (2014) 'Delegation and Pooling in International Organizations,' *Review of International Organizations*, published online (24 pages), DOI10.1007/s11558-014-9194-4.
- Hurrell, A. (1995) 'Regionalism in Theoretical Perspective'. In Fawcett, L. and Hurrell, A. (eds) *Regionalism in World Politics: Regional Organization and International Order*. (New York: Oxford University Press).
- Iheduru, O. (2012) 'Regional Integration and the Private Authority of Banks in West Africa', *International Studies Review*, Vo. 14, No. 2, pp. 273-302.
- Jepsen, M. (2005) 'The European Social Model: an Exercise in Deconstruction'. *Journal of European Social Policy*, Vol. 15, No. 3, pp. 231–245.
- Jetschke, A. and Lenz, T. (2012) 'Does Regionalism Diffuse? A New Research Agenda for the Study of Regional Organizations'. *Journal of European Public Policy*, Vol. 20, No. 4, pp. 626–637.
- Katzenstein, P. (2005) *A World of Regions: Asia and Europe in the American Imperium* (Ithaca, NY: Cornell University Press).
- Kenen, P.B. and Meade, E.E. (2008) *Regional Monetary Integration* (Cambridge: Cambridge University Press).
- Langenhove, L. (2011) *Building Regions: The Regionalization of World Order* (Farnham: Ashgate).

- Langenhove, L. (2012) 'Why We Need to Unpack Regions to Compare Them More Effectively'. In Fioramonti, L. (ed) *Regionalism in a Changing World: Comparative Perspectives in the New Global Order* (London: Routledge).
- Langenhove, L. (2013) 'The Unity in Diversity in Regional Integration Studies', *Georgetown Journal of International Affairs*, Summer/Fall 2013, pp. 19-28.
- Laursen, F. (ed.) (2003) *Comparative Regional Integration* (Farnham: Ashgate)
- Lombaerde, P. de, et al. (2010) 'Problems and Divides in Comparative Regionalism'. In Laursen, F. (ed) *Comparative Regional Integration: Europe and Beyond* (Farnham: Ashgate).
- Loriaux, M. (1999) 'Realism and Reconciliation: France, Germany and the European Union'. In Kapstein, E.B. and Mastanduno, M. (eds) *Unipolar Politics: Realism and State Strategies after the Cold War* (New York: Columbia University Press).
- Mattheis, F. (2010) 'EU Interregionalism: Hub-and-spokes or a World of Regions? The Case of Relations with SADC and Mercosur.' *Studia Diplomatica*, Vol. LXIII, No. 3-4, pp. 105-118.
- Mattheis, F. (2015) *New regionalism in the South – Mercosur and SADC in a comparative and interregional perspective* (Leipzig: Leipzig University Press).
- Mattli, W. (1999) *The Logic of Regional Integration: Europe and Beyond* (Cambridge: Cambridge University Press).
- Mattli, W. (2012) 'Comparative Regional Integration: Theoretical Developments'. In Jones, E. et al. (eds) *Oxford Handbook of the European Union* (Oxford: Oxford University Press).

- McKay, D.H. (2001) *Designing Europe: Comparative Lessons from the Federal Experience* (Oxford, New York: Oxford University Press).
- Meyer, J.W., Boli, J., Thomas, G.M. and Ramirez, F.O. (1997) 'World Society and the Nation-State'. *American Journal of Sociology*, Vol. 103, No. 1, pp. 144-181
- Murray, P. (2010) 'Comparative Regional Integration in the EU and East Asia: Moving Beyond Integration Snobbery', *International Politics*, 47, pp. 308-323.
- Nshimbi, C. and Fioramonti, L. (2014) 'The Will to Integrate: South Africa's Responses to Regional Migration from the SADC Region'. *African Development Review*, Vol. 26, No.1, pp. 52-63.
- Nye, J.S. (1965) *Pan-Africanism and East African integration* (Cambridge, Mass.: Harvard University Press).
- Pedersen, T. (2002) 'Cooperative hegemony: power, ideas and institutions in regional integration'. *Review of International Studies*, Vol. 28, No. 04.
- Penketh, A. (2007) 'Miliband: the EU Must be a Model Power, not a Superstate', *The Independent*, 16 November.
- Riker, W.H. (1964) *Federalism – origin, operation, significance* (Boston: Little, Brown and Company).
- Rosamond, B. (2009) 'New Theories of European Integration'. In Cini, M. and Borragan, N.P.-S. (eds) *European Union Politics: 3rd Revised edition*. (Oxford: Oxford University Press).
- Söderbaum, F. (2004) 'Modes of Regional Governance in Africa: Neoliberalism, Sovereignty Boosting, and Shadow Networks'. *Global Governance*, Vol. 10, pp. 419-436.

- Söderbaum, F. (2009) 'Comparative Regional Integration and Regionalism'. In Landman, T. and Robinson, N. (eds) *The SAGE Handbook of Comparative Politics* (Los Angeles: Sage).
- Söderbaum, F. (2012) 'Theories of Regionalism'. In Beeson, M. (ed) *Routledge Handbook of Asian regionalism*. (London: Routledge).
- Solingen, E. (ed) (2014) *Comparative Regionalism: Economics and Security* (London: Routledge).
- Telò, M. (ed) (2001) *European Union and New Regionalism* (Aldershot: Ashgate).
- Tieku, T.K. (2004) 'Explaining the Clash and Accommodation of Interests of Major Actors in the Creation of the African Union. *African Affairs*, Vol. 103, No. 411, pp. 249-267.
- UNCTAD (2013) *Intra-African Trade: Unlocking Private Sector Dynamism* (New York: United Nations Conference on Trade and Development).
- UNECA (2013) *Report on the Magnitude of and Tools for Measuring Informal Cross Border Trade in Africa's Regional Economic Communities* (Addis Ababa: United Nations Economic Commission for Africa).
- Walraven, K. (1999) *Dreams of Power: The Role of the Organization of African Unity in the Politics of Africa, 1963-1993* (Aldershot: Ashgate).
- Vaughan-Whitehead, D. (2003) *EU Enlargement versus Social Europe? The Uncertain Future of the European Social Model* (Cheltenham, UK: Edward Elgar).
- Viner, J. (1950) *The Customs Union Issue* (New York: Carnegie Endowment for International Peace).

Zank, W. (2007) 'A Comparative European View on African Integration: Why It Has Been Much More Difficult in Africa Than in Europe', Working Paper 4, CCIS Research Series, Aalborg University.

Zank, W. (2012) 'A Region of Crises: North Africa Under the Influence of Arab, African and European Integration Processes'. In Fioramonti, L. (ed) *Regions and Crises: New Challenges for Contemporary Regionalisms* (Basingstoke: Palgrave Macmillan).

Table 1 – Comparing regionalism: an integrated framework

Traditional approaches to regional integration		New regionalism approaches	
Themes	Linear process	Fuzzy process	Themes
	Formal institutions	Informal institutions	
	State centric leadership	Diffused leadership	
	Economic incentives	Social dimensions	
	Shared sovereignty	Levels of cooperation	
	Territory	Identity	
Key dimensions: process; institutional design; leadership; membership; sovereignty; drivers; identity.			

Table 2 – Comparative framework applied to European and African regionalisms

<i>DIMENSIONS</i>	Europe	Africa
<i>Process</i>	Gradualist, step-wise functional expansion (non-linear)	Grand ambitions but little functional cooperation/integration (non-linear)
<i>Institutional design</i>	Mixed formula combining intergovernmental and supranational roles	Dominance of intergovernmental decision-making
<i>Membership</i>	Selective and exclusive, based on <i>acquis communautaire</i>	Territorially inclusive with minimal restrictions
<i>Leadership</i>	Cooperative hegemony	Reluctant hegemony

<i>Sovereignty</i>	Pooling and subsidiarity	Non-interference, with gradual erosion of national prerogatives
<i>Drivers</i>	Free trade and social cohesion (prevalence of low-politics)	Security focus (high-politics, with some achievements in economic and social integration)
<i>Identity</i>	Top-down promotion of European identity	Strong sense of belonging based on Pan-Africanism